

**MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES**

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

<b>Plaintiffs' Executive Committee for Personal Injury and Death Claims</b>	<b>Plaintiffs' Executive Committee for Commercial Claims</b>
Ronald L. Motley, (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haefele, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

**VIA ECF**

April 18, 2019

The Honorable Sarah Netburn  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 430  
New York, NY 10007

RE: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

The Plaintiffs' Executive Committees ("PECs") write to request a brief extension of the deadline to provide the Court with a discovery status report concerning the remaining thirteen defendants in merits and jurisdictional discovery, as requested in Your Honor's April 11, 2019 Order (ECF No. 4484). The Court's Order currently requires that the parties submit the status report on Friday, April 19, 2019. Members of the Committees have been working together to address multiple issues regarding the defendants identified in the Order and to draft text for a jointly considered letter. However, due to the schedules of several members of the PECs relating to the Easter and Passover holidays, and the inherent difficulties of coordinating a joint submission on behalf of numerous parties with separate counsel, a brief extension is necessary. Accordingly, the PECs respectfully request an extension of the deadline to provide Your Honor with the requested discovery status report to Tuesday, April 23, 2019. The DEC has indicated that it does not oppose but otherwise takes no position as to the PECs request.

Respectfully submitted,

COZEN O'CONNOR



By: J. Scott Tarbutton, on behalf of the  
Plaintiffs' Executive Committees

cc: All MDL Counsel of Record (via ECF)